

## UNITED STATES DISTRICT COURT

for the

District of Nebraska

**SEALED**

United States of America

v.

ANDREW I. ABRAMS

Case No. 8:21MJ261

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 23, 2021 in the county of Douglas in the  
District of Nebraska, the defendant(s) violated:

*Code Section*

18 U.S.C. 875(c)

*Offense Description*Transmission of an Interstate Communication Containing a Threat to Injure  
the Person of Another

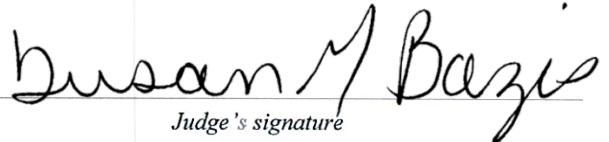
This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.☐ Sworn to before me and signed in my presence.☒ Sworn to before me by telephone or other reliable  
electronic means.Date: 4-30-21City and state: Omaha, Nebraska

*Complainant's signature*

Adam Marcotte, TFO, FBI

*Printed name and title*

*Judge's signature*

SUSAN M. BAZIS, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

**DISTRICT OF NEBRASKA)**

**COUNTY OF DOUGLAS**

)  
)

ss.

**Affidavit of TFO Adam Marcotte**

I, Adam Marcotte, having been first duly sworn, do hereby depose and state as follows:

**INTRODUCTION**

1. This affidavit is submitted to demonstrate that probable cause exists to believe that Andrew ABRAMS, currently of Tucson, Arizona, transmitted multiple threats in interstate commerce in violation of Title 18, United States Code, Section 875(c) and that those threats were received and directed at multiple victims and locations in Omaha, Nebraska and the District of Nebraska.

2. I am a Task Force Officer with the Federal Bureau of Investigation and have been since 2017. I am currently assigned to the Joint Terrorism Task Force (JTTF) of the Omaha Field Office, charged with investigating crimes related to terrorism both international and domestic. Prior to joining the FBI, I was and still currently serve as an investigator for the Douglas County Sheriff's Office. I have received relevant training in investigations to include terrorism, violent crime, threat crimes, explosives and firearms crimes, crimes against persons, crimes against property, and financial crimes. I have served as a Douglas County Deputy for 16 years, receiving my state law enforcement certification from Grand Island, NE in 2005 and have worked as an investigator, road patrol deputy, courthouse security and member of the hostage negotiation team. As a TFO on the JTTF, I have investigated terrorism-related cases that have led to arrest, convictions, and other dispositions of those who violated federal crimes. In

addition, I have made many arrests which have led to convictions on the state side as a Deputy Sheriff.

PURPOSE OF THIS AFFIDAVIT

3. This affidavit is submitted in support of a criminal complaint and arrest warrant for ANDREW ABRAMS, a white male, born in 1980. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not set forth each and every fact known to me regarding this investigation. The statements contained in this affidavit are based in part on the investigation that I have conducted, and information provided to me by other law enforcement officers verbally, and through written reports.

OVERVIEW OF INVESTIGATION

4. On Friday, April 23, 2021, at approximately 0840hrs, Omaha Police Officers received a radio call to Union Pacific Railroad Headquarters, 1400 Douglas Street, for a possible bomb threat. Upon arrival, officers met with reporting party, an employee of Union Pacific, who stated to officers that the company's Crisis Hotline received a phone call with a male voice speaking on the other end of the call and that the displayed number was **520-500-3614** with an Arizona area code. The caller stated a moving truck was loaded with two tons of explosive material and would be parked near their building at 1400 Douglas Street in Omaha, Nebraska in the District of Nebraska. That conversation was recorded. A copy was subsequently obtained and placed into evidence by OPD officers. A cursory search of the Union Pacific building and corresponding parking garage yielded negative results for any potential explosives.

5. Near the same time, the Douglas County Courthouse, 1701 Farnam Street, received a phone call from a male speaker using the same phone number, **520-500-3614**. An

officer responded to the courthouse to gather more information about that phone call. The officer advised the male speaker had made a threat that a Ryder moving truck was full of explosives and would be in the downtown area.

6. During the investigation, another officer attempted to locate a vehicle matching that description in the downtown area. A van similar to a moving truck was parked in the area of South 16th and Howard Streets. The vehicle had Nebraska plates and the back tailgate was slightly open allowing the officer to peer into the back which was mostly empty. Officers also informed surrounding construction site foremen to be on the lookout for any vehicles that did not belong to them parked in their construction sites.

7. A sergeant with OPD further advised the construction personnel at South 13th and Farnam/Douglas to review their on-site trucks and report any anomalies or suspicious trucks to 911 immediately. Officers also checked the area near the CHI Center for suspicious vehicles with negative results. The area encompassing a 1/4-mile radius, at a minimum, of both locations was checked for suspicious vehicles and activity with negative results. It was originally believed the caller might have been a known caller to UP personnel from previous calls, but that was dismissed upon further investigation. Douglas County Sheriff deputies were sweeping both the interior and exterior of the Douglas County Courthouse/Civic Center. Nothing out of the ordinary was located.

8. On the same day, another call containing a verbal threat was received to an Omaha area school from number **(520) 500-3614**. The caller threatened Millard Public Schools, Elkhorn Schools and Westside Schools in Omaha, Nebraska. The caller identified himself as ABRAMS and claimed bombs and shootings would occur at the schools.

9. On April 29, 2021, a judicially authorized search warrant for historical and prospective cell site location data was served on T-Mobile, the provider for this suspect phone number, **(520) 500-3614**. T-Mobile, in response to the warrant, notified investigators that the cellular phone was “pinging” off the tower nearest ABRAMS apartment in Tucson, Arizona. Investigative techniques were utilized to locate the cellphone or “ping” within 8 meters of 2401 E. Glenn St., Apt 39, Tucson, AZ 85719. ABRAMS is the sole occupant of the aforementioned address. ABRAMS was observed going into that apartment on April 28, 2021 by an employee of the complex. ABRAMS is the only occupant of the apartment according to complex personnel.

10. FBI investigators in Tucson, Arizona placed the apartment under surveillance and determined in a voluntary conversation with ABRAMS by phone and text message that ABRAMS’ current phone number is **(520) 500-3614**. ABRAMS denied placing the threatening phone calls but could not explain how someone else could have used his phone number to place the calls. ABRAMS did volunteer that he was in email communication with Union Pacific within several weeks of the phone calls. ABRAMS further stated that he had been taking his prescribed medications and was in compliance with his mental health outpatient program around the time of the calls and the interview.

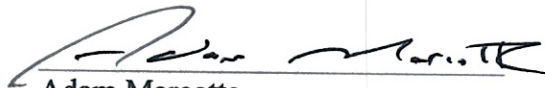
#### CRIMINAL HISTORY OF ANDREW ABRAMS

11. ABRAMS is a white male, born in 1980, with brown hair and blue eyes. A criminal records check for ABRAMS revealed he has been arrested for Threatening Crime with Intent to Terrorize, Battery, and Assault with a Deadly Weapon, Los Angeles, CA Police Dept. (06/22/2015), Threatening Crime with Intent to Terrorize, and Assault with a Deadly Weapon,

(04/08/2016), Los Angeles, CA Police Dept., and Driving While Intoxicated-1<sup>st</sup> Offense,  
(05/22/2009), NY.

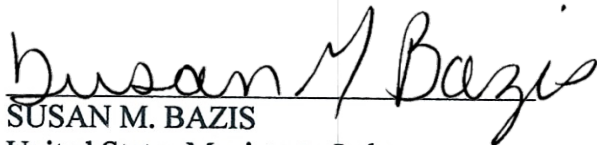
CONCLUSION AND REQUEST TO SEAL

12. Based upon the above facts and circumstances, I believe sufficient probable cause exists to authorize a criminal complaint and arrest warrant for Andrew ABRAMS, regarding the violations of Title 18, United States Code, Section 875(c), transmitting threats in interstate commerce. I also respectfully request that the Court seal this affidavit until further order of the Court, due to the ongoing investigation, as well as to protect the cooperating witnesses who have provided information in this case.



Adam Marcotte  
Task Force Officer  
Federal Bureau of Investigation

Subscribed and sworn before me this 30 day  
of April 2021.



SUSAN M. BAZIS  
United States Magistrate Judge  
District of Nebraska